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8
9 Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 SELINA KEENE, MELODY FOUNTILA,
14 MARK MCCLURE,
15 Plaintiffs,
16 vs.
17 CITY and COUNTY OF SAN FRANCISCO
18 Defendant.

DECLARATION OF BRENDEN LIM

Judge: Honorable Jeffrey S. White
Filed: March 14, 2022
Trial Date: None set

1 I, Brenden Lim, declare:

2 1. I am currently employed by the City and County of San Francisco (the "City") as a
3 Manager III at the Human Services Agency ("HSA").

4 2. Except where stated otherwise, I have personal knowledge of the following facts and, if
5 called to testify, could and would testify competently thereto.

6 3. On October 12, 2021, Selina Keene emailed me concerning a COVID-19 Vaccination
7 Exemption, attaching an "Employee Request for Religious Accommodation" and a "Religious
8 Vaccine Exemption Letter" signed by Pastor Jesse Gistand of the Grace Bible Church. A true and
9 correct copy of that email and its attachments are attached hereto as **Exhibit 1.**

10 4. On October 12, 2021, Lily Tang emailed Ms. Keene and asked her to respond to several
11 questions to assist in evaluating her exemption request. On October 17, 2021, after further back and
12 forth between Ms. Tang and Ms. Keene, Ms. Keene emailed me and Ms. Tang, attaching responses to
13 those questions, along with another copy of the "Religious Vaccine Exemption Letter," signed by
14 Pastor Jesse Gistand. A true and correct copy of that correspondence and attachments is attached
15 hereto as **Exhibit 2.**

16 5. Keene's request for a religious exemption was denied on October 20, 2021. A true and
17 correct copy of the Determination on COVID-19 Vaccination Exemption Request is attached hereto as
18 **Exhibit 3.**

19 6. On September 23, 2021, Melody Fountila emailed me concerning a COVID-19
20 Vaccination Exemption, attaching an "Employee Request for Religious Accommodation," as well as a
21 letter from Pastor Jesse Gistand that appears to be virtually identical to the one provided by Ms.
22 Keene. A true and correct copy of that correspondence and attachments is attached hereto as **Exhibit**
23 **4.**

24 7. On September 27, 2021 and October 12, 2021 Ms. Tang and Ms. Fountila exchanged
25 further correspondence, on which I was copied, in order to gather additional information concerning
26 Ms. Fountila's request for a religious exemption. A true and correct copy of that correspondence,
27 along with attachments, is attached hereto as **Exhibit 5.**

EXHIBIT 1

From: [Selina Keene](#)
To: [HSA Civil Rights](#); [Lim Brenden HSA DSS](#); [White, Janie \(HRD\)](#); [DeLeon, Andrea \(HSA\)](#)
Cc: [Daniela Gonzalez](#); [Jason Klumb](#); [Joseph Bryant](#); [selina.keene@sfgov.org](#); [Morgan, Darryl \(HSA\)](#); [Selina Keene](#); [David Canham](#)
Subject: Ms. K's Request for Religious Exemption Accommodation
Date: Tuesday, October 12, 2021 12:13:00 PM
Attachments: [Selina Keene Religious Exemption Accommodation Request 9-17-2021.tif](#)
[Grace Bible Church Religious Exemption for Selina Keene.tif](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Mr. Lim, OCR and SFDHR,

Please excuse the delay in submitting my Religious Exemption Accommodation form and support letter. The tragic turn of events over the past several months has been overwhelming to say the least and has kept me very busy assisting and supporting other members with their own stringent lengthy accommodation process to save their jobs. Unfortunately, this has caused delays in my own submission of required Religious exemption accommodation.

I have cc'd my 1021 Union Representatives on this email and am providing you written authorization to maintain them throughout the inactive process email thread to provide any additional support that may be necessary.

I appreciate you providing a confirmation email that you have received my request.

Your attention, assistance and support is appreciated.

Respectfully,

Selina Keene (Ms. K)

9704 E&T Spec. 3

HSA Chapter President / Shop Steward / Delegate



City and County of San Francisco

**EMPLOYEE REQUEST FOR
RELIGIOUS ACCOMMODATION
(COVID-19 Vaccination Exemption)**

Employee Name	Employee DSW#
SELINA KEENE (MS. K)	21119
Job Code and Title	Department
9704 EMPLOYMENT & TRAINING SPEC. 3	HUMAN SERVICE AGENCY
Division/Unit	Supervisor/Manager
WDD	KEMEISHA JAMES / BART ELLISON

The City and County of San Francisco (City) is committed to equal employment opportunities for all employees and a work environment that is free of unlawful harassment, discrimination, and retaliation. Consistent with this commitment, the City complies with all laws protecting employees' religious beliefs, practices and observances. When requested, the City will provide an exemption or reasonable accommodation for employees' sincere religious beliefs, practices and observances, which prohibit the employee from receiving a COVID-19 vaccination, provided the requested accommodation is reasonable and does not create an undue hardship for the City or pose a direct threat to the health and/or safety of the employee or others in the workplace.

San Francisco Department of Public Health Order No. C19-07, requires persons routinely working onsite in High-Risk Settings as defined in the Order to receive a COVID-19 vaccination and report their vaccination status to their employer effective September 15, 2021. City policy must comply with this public health order, and will also require all other City employees to receive a vaccination within 10 weeks of FDA approval of any COVID-19 vaccine. A religious exemption may be granted to City employees who: (1) hold a sincere religious belief that conflicts with the vaccination requirement, (2) complete this request form, and (3) provide any information needed to support the exemption request.

EMPLOYEE CERTIFICATION

I request an exemption from the local Public Health Order and City Policy requiring COVID-19 vaccinations for all City employees. I make this request based on my sincere religious belief(s), practice(s), or observance(s). My beliefs are in conflict with the vaccination requirement, and I certify the following is true:

1. My religion or belief system is (enter name or description): CHRISTIAN
2. I have held this belief(s) system, or practiced and observed this religion since (enter date or year): 1989
3. My religion, belief system, or practice requires me to abstain from the COVID-19 vaccination because (describe the specific tenet, practice, or observation that conflicts with the COVID-19 vaccination requirement and/or explain how you follow it):

My sincerely held religious beliefs as a spiritual being with a Christian worldview do not allow me to receive a COVID-19 vaccine. My belief are an all-encompassing guide to my daily life choices and while I am not perfect, I strive to honor God in all I do. (Matthew 22:37) The COVID-19 vaccines include the current COVID-19 mRNA vaccines and the Janssen vaccine which are produced with aborted fetal cell lines. The Johnson & Johnson vaccine (Janssen), uses retinal cells from a fetus that was aborted in 1985 and treated in a lab; since the Pfizer and Moderna vaccines test the mRNAs on fetal cell lines from an aborted fetus cell from 1973. Therefore, in my sincerely held belief as a spiritual being with a Christian worldview, I cannot use any product that takes its origin in abortion.

Continued on Page 2

4. If your religion, belief system, or practice requires you to abstain from the COVID-19 vaccination, but not other

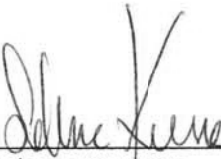
EMPLOYEE REQUEST FOR RELIGIOUS ACCOMMODATION
(COVID-19 Vaccination Exemption), Page 2 of 2

types of vaccinations, please describe the specific tenet, practice, or observation that expressly conflicts with the COVID-19 vaccination (*attach a separate sheet if needed*).

5. If requested, I can provide a written statement, an affidavit or other documents from a religious leader, or other person describing my beliefs and practices, including information regarding when I embraced the belief or practice, as well as when, where, and how I have adhered to the belief, practice, observance. ☒ YES ☐ NO

I hereby certify that I make this request based on my sincerely held religious beliefs that prevent me from complying with COVID-19 vaccination requirements. I understand that any falsified information can lead to disciplinary action, up to and including termination of employment.

I also understand that my request for an accommodation may not be approved if it is not reasonable, if it poses a direct threat to the health and/or safety of others in the workplace and/or me, or if it creates an undue hardship for the City.


Employee Signature

9/17/2021
Date

Please note that this information will be maintained in a separate confidential file from your personnel file and access will be limited only to those with a need-to-know.

FOR HR USE ONLY

Date Received: ___/___/20___ Medical Certification Received ☐ Yes ☐ No
Date Medical Certification Received: ___/___/20___



RELIGIOUS VACCINE EXEMPTION LETTER

August 24, 2021

To Whom It May Concern:

I SARINA KEENE (MS.K) hold as:

My sincerely held religious beliefs as a spiritual being with a Christian worldview do not allow me to receive a COVID-19 vaccine.

My beliefs are an all-encompassing guide to my daily life choices and while I am not perfect, I strive to honor GOD in all I do. Matthew 22:37

The COVID-19 vaccines include the current COVID-19 mRNA vaccines and the Janssen vaccine which are produced with aborted fetal cell lines.

The Johnson & Johnson vaccine (Janssen), uses retinal cells from a fetus that was aborted in 1985 and treated in a lab; since the Pfizer and Moderna vaccines test the mRNAs on fetal cell lines from an aborted fetus cell from 1973.

Therefore, in my sincerely held belief as a spiritual being with a Christian worldview, I cannot use any product that takes its origin in abortion.

"For you created my inmost being; you knit me together in my mother's womb." Psalm 139:13. The inmost being is extremely sacred. I will not knowingly participate in the process to use such a product that violates the right to life and dishonors the lives of the unborn. God's word tells me to keep my body pure. I cannot receive a COVID-19 vaccine under any circumstance.

Furthermore, the V.A.E.R.S report provided by the CDC has shown significant harm injury, and death by the implementation of these experimental vaccines in just 6 months.

Total reactions for the experimental mRNA vaccine **Tozinameran** (code **BNT162b2, Comirnaty**) from **BioNTech/ Pfizer: 9,868 deaths** and **767,225 injuries** to 31/07/2021

Total reactions for the experimental mRNA vaccine **mRNA-1273(CX-024414)** from **Moderna: 5,460 deaths** and **212,474 injuries** to 31/07/2021

These serious and fatal injuries are increasing daily and confirm injury and harm. Even 40% of the employees of the CDC have not taken the vaccines having faced these claims as per Dr. Fauci's own words.

My Body is the "...Temple of the Living GOD..." 1 Corinthians 6:19-20 and I shall not knowingly do any harm to myself or others by participating in this experimental program.


I trust in the LORD. Ephesians 6:10-18 directs us to "Put on the armor of God," so that we can be equipped with truth, righteousness, peace, and faith. We are taught not to be afraid and that we have divine protection. In GOD and Jesus Christ, I Trust.

I can certainly testify to this because as you are aware, throughout the whole pandemic, I have been working according to your policies and measures required of the employees.

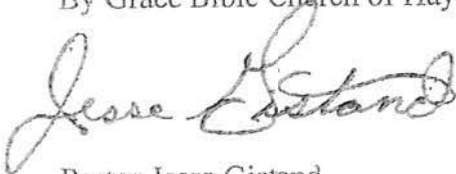
I wish to continue my gainful employment with this company as my family depends upon it and I am willing to make the necessary adjustments that will work towards that end without violating my conscience.

The law requires accommodations to be offered for religious exemptions. My sincerely held ethical, moral, and religious beliefs are universal, encompassing my belief and faith in Jesus Christ and I cannot violate my conscience, given to me by God.

I am available to answer additional questions if needed, provided they are a "reasonable inquiry," as allowed for by law.

Sincerely, 

This religious exemption letter is written and approved
By Grace Bible Church of Hayward CA



Pastor Jesse Gistand

EXHIBIT 2

From: Selina Keene
To: Tang, Lily (HSA); Lim, Brenden (HSA)
Cc: Daniela Gonzalez; Jason Klumb; Joseph Bryant; Morgan, Darryl (HSA); David Canham; White, Janie (HRD); Keene, Selina (HSA); Selina Keene
Subject: Re: Ms. K's Request for Religious Exemption Accommodation
Date: Sunday, October 17, 2021 5:37:30 PM
Attachments: HSA OCR Additional Religious Exemption Accommodationm Clarification Questions - 10-12-2021.pdf
Grace Bible Church Religious Exemption for Selina Keene.tif

Afternoon Ms. Tang,

Thank you for your response.

I have attached my sincere religious belief response to your questions below, but I ask that this request for Religious exemption accommodation be kept 100% confidential as it contains thoughts and statements not shared in casual conversations and are deeply personal to me, nor do I want to experience unnecessary bias, disparity or discrimination on the job due to breach of confidentiality. I asked that this be shared on an as-needed basis; that is, only those charged with approving the exemption request should read our words.

Please note that the attached response to your questions is an explanation of my sincerely held personal religious beliefs. I hope I have described them sufficiently. Again, these thoughts are the unique message I receive from my GOD. I don't ask that you, or anyone else, agree with these thoughts and personal translations. But under the law, I respectfully request that they be honored as truthful and legally permissible. Based on what I have shared, I ask this religious exemption be approved.

I am concerned about the timeframe statement you mentioned regarding completion of approval to determine my Religious Exemption Accommodation request. You stated that the determination will take the next week or so, which appears may run past the November 1st deadline. My understanding attending the Citywide Covid meet and confer table is the exemption accommodation process should be a seven (7) day turnaround for requests to be completed. Is this information not adequate? Please advise.

In closing, I look forward to your response and granting my Religious Exemption accommodation request.

Your attention, assistance and support is appreciated.

Ms. K
9704 E & T Spec. III
HSA Chapter President / Shop Steward / Delegate

Attachments:
HSA OCR Additional Religious Exemption Questionnaire Response 10/12/2021
Grace Bible Church Religious Exemption Letter (previously submitted)

cc: Daniela Gonzalez (SEIU 1021), Jason Klumb (SEIU 1021), Joseph Bryant (SEIU 1021 Pres), Darryl Morgan (HSA Chapter Secretary), David Canham (SEIU 1021), Janie White (SFDHR), Selina Keene and file.

On Wed, Oct 13, 2021 at 10:37 PM Tang, Lily (HSA) <lily.tang@sfgov.org> wrote:

Hi Ms. K.,

Sorry, I will be out of the office and will return next Monday.

The type of questions depends on the religious exemption request but I'm not sure what questions are being asked by other departments.

As we are in the process of evaluating your exemption request, answers to these questions will be helpful in understanding individual sincere held beliefs. Please respond to the questions below by next Monday. After receiving your responses, we will be evaluating your responses and documentation to make a determination in the next week or so.

Thanks,

Lily

From: Selina Keene <skeene1021@gmail.com>

Sent: Tuesday, October 12, 2021 4:14 PM

To: Tang, Lily (HSA) <lily.tang@sfgov.org>; White, Janie (HRD) <janie.white@sfgov.org>; HSA Civil Rights <hsacivilrights@sfgov.org>

Cc: Daniela Gonzalez <daniela.gonzalez@seiu1021.org>; Jason Klumb <jason.klumb@seiu1021.org>; Joseph Bryant <joseph.bryant@seiu1021.org>; Keene, Selina (HSA) <selina.keene@sfgov.org>; Morgan, Darryl (HSA) <darryl.morgan@sfgov.org>; David Canham <david.canham@seiu1021.org>; Lim, Brenden (HSA) <brenden.lim@sfgov.org>; DeLeon, Andrea (HSA) <andrea.deleon@sfgov.org>; Selina Keene <skeene1021@gmail.com>

Subject: Re: Ms. K's Request for Religious Exemption Accommodation

Hello Ms. Lily Tang,

I just noticed instead of receiving a response to my email questions, I received an additional out of office reply email from you with an August 31st return date, which doesn't appear to be updated.

Was this a mistake or are you suddenly out of the office and are unable to answer my questions in reasonable timeframe?

If you are suddenly out of the office, who else in OCR can provide me a response, so I can move forward and adequately respond and complete the series of Religious questions, so you can evaluate and process my exemption request in a timely manner.

Very concerned,

Ms. K

HSA Chapter President / Shop Steward / Delegate

On Tue, Oct 12, 2021, 3:28 PM Selina Keene <skeene1021@gmail.com> wrote:

Hello Ms. Lily Tang,

Prior to a response, please clarify, verify and confirm the following:

Are the number and type of questions you provided to me consistent with all requests for Religious Exemptions submitted to workers across the agency as well as citywide?

What is the current process timeframe for obtaining an approval decision? Is it still consistent with a 7 day turnaround?

Your attention, assistance and cooperation is appreciated.

Thank you

Ms. K

HSA Chapter President / Shop Steward / Delegate

On Tue, Oct 12, 2021, 2:06 PM Tang, Lily (HSA) <lily.tang@sfgov.org> wrote:

Hi Ms. K.,

We have received your religious exemption request. Please respond to the questions below to assist us in evaluating your religious exemption request.

No.	Question	Response
1.	Please identify the specific religious tenet that prohibits the COVID-19 vaccination.	
2.	Please identify the Christian Sect or denomination that teaches that the COVID-19 vaccination is prohibited	
3.	Can you provide any existing literature to support your exemption request?	
4.	State whether the views expressed in your religious exemption request are part of a shared or comprehensive doctrine and how long the doctrine has existed.	
5.	Do you regularly worship with others sharing your beliefs about the COVID-19 vaccine, if so, how often and where are services generally held?	
6.	Do you have a declaration	

	supporting your religious exemption request from your pastor or religious leader?	
7.	Please identify the specific religious tenet, practice or observation used to identify substances that are harmful, and state how you applied this to the COVID-19 vaccine	
8.	Please identify the specific religious tenet, practice or observance that prohibits receiving vaccines developed or tested using fetal cell lines.	
9.	The Vatican, Evangelicals and numerous other Christian groups have endorsed the COVID-19 vaccines and pronounced that the connection between the fetal cell lines used in vaccine testing and actual abortion is sufficiently remote and the pandemic sufficiently serious to allow members to receive the vaccine in good conscience. Are your beliefs contrary to this pronouncement? If so, why?	
10.	Have you taken vaccines for any of the following diseases: rubella (measles), varicella (chickenpox), or hepatitis A?	
11.	Have you authorized your children to receive vaccines for rubella (measles), varicella (chickenpox), or hepatitis A?	
12.	If your answer to question #10	

	and/or #11 is “yes,” why is your position with respect to the COVID-19 vaccine different than for these other vaccines, all of which are also grown in cell lines derived from fetuses?	
13.	Many common medications were also developed using the same type of technology used in the development of Covid-19 vaccines, including Tylenol, Pepto Bismol, aspirin, Tums, Lipitor, Senokot, Motrin, ibuprofen, Maalox, Ex-Lax, Benadryl, Sudafed, albuterol, Preparation H, Claritin, Zoloft, Prilosec OTC, and azithromycin. Do your beliefs prohibit you from taking and will you in the future abstain from taking these and other similar medications? If not, what tenet or belief prohibits the use of the Covid-19 vaccine, but permits the use of these other medications?	

Thanks,

Lily Tang (she, her, hers)

Analyst

Human Resources: Office of Civil Rights

O: (415) 557-5810

C: (415) 624-5042

Mailing Address:

1650 Mission Street, Suite 400
San Francisco, California 94103

www.SFHSA.org

From: HSA Civil Rights <hsacivilrights@sfgov.org>
Sent: Tuesday, October 12, 2021 12:18 PM
To: Tang, Lily (HSA) <lily.tang@sfgov.org>
Subject: FW: Ms. K's Request for Religious Exemption Accommodation

From: Selina Keene <skeene1021@gmail.com>
Sent: Tuesday, October 12, 2021 12:12 PM
To: HSA Civil Rights <hsacivilrights@sfgov.org>; Lim, Brenden (HSA) <brenden.lim@sfgov.org>; White, Janie (HRD) <janie.white@sfgov.org>; DeLeon, Andrea (HSA) <andrea.deleon@sfgov.org>
Cc: Daniela Gonzalez <daniela.gonzalez@seiu1021.org>; Jason Klumb <jason.klumb@seiu1021.org>; Joseph Bryant <joseph.bryant@seiu1021.org>; Keene, Selina (HSA) <selina.keene@sfgov.org>; Morgan, Darryl (HSA) <darryl.morgan@sfgov.org>; Selina Keene <skeene1021@gmail.com>; David Canham <david.canham@seiu1021.org>
Subject: Ms. K's Request for Religious Exemption Accommodation

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Mr. Lim, OCR and SFDHR,

Please excuse the delay in submitting my Religious Exemption Accommodation form and support letter. The tragic turn of events over the past several months has been overwhelming to say the least and has kept me very busy assisting and supporting other members with their own stringent lengthy accommodation process to save their jobs. Unfortunately, this has caused delays in my own submission of required Religious exemption accommodation.

I have cc'd my 1021 Union Representatives on this email and am providing you written authorization to maintain them throughout the inactive process email thread to provide any additional support that may be necessary.

I appreciate you providing a confirmation email that you have received my request.

Your attention, assistance and support is appreciated.

Respectfully,

Selina Keene (Ms. K)

9704 E&T Spec. 3

HSA Chapter President / Shop Steward / Delegate

CCSF-HSA - All outbound HSA email is automatically scanned for PII and PHI by Zix Email Encryption

No.	Question	Response
1.	Please identify the specific religious tenet that prohibits the COVID-19 vaccination.	As previously stated in my Religious Exemption Accommodation request, my body is the temple of God. If anyone destroys God's temple, God will destroy him. For God's temple is holy. 1 Corinthians 3:16-17 - My body is not to be subjected to coercive experiments with clear danger and harm already proven by the CDC/VAERS.
2.	Please identify the Christian Sect or denomination that teaches that the COVID-19 vaccination is prohibited	<p>As an evangelist Christian that believes the Bible is the Word of GOD – Jesus said unto him, Thou shalt love the Lord thy God with all thy heart, and with all thy soul, and with all thy mind. This is the first and great commandment. And the second is like unto it, Thou shalt love thy neighbor as thyself, and loving GOD and neighbor means do no harm.</p> <p>1 Corinthians 6:20 Honor the Lord with your bodies.</p> <p>Romans 13:10 Love worketh no ill to his neighbor, therefore love is the fulfilling of the Bible's law.</p>
3.	Can you provide any existing literature to support your exemption request?	<p>The Bible – The Word of GOD – Title VII code of the Federal Civil Rights Act of 1964 protects employees and job applicants from employment discrimination based on race, color, religion, sex and national origin.</p> <p>In my sincere religious beliefs and practice, I live my life to protect and support others as well as myself and to do no ill will or harm to no one.</p>
4.	State whether the views expressed in your religious exemption request are part of a shared or comprehensive doctrine and how long the doctrine has existed.	The Church of Jesus Christ has existed since 33 AD and has always engaged the World to love GOD, live in His Word and do no harm as previously stated.
5.	Do you regularly worship with others sharing your beliefs about the COVID-	This specific line of questioning is irrelevant to the matter at hand and serves as no direct bearing on my sincere religious beliefs or understanding or interpretation of the Word of

	19 vaccine, if so, how often and where are services generally held?	GOD and appears to only serve as some data gathering.
6.	Do you have a declaration supporting your religious exemption request from your pastor or religious leader?	Already submitted!
7.	Please identify the specific religious tenet, practice or observation used to identify substances that are harmful, and state how you applied this to the COVID-19 vaccine	<p>I am an evangelical Christian who believes the Bible as the Word of GOD – Matthew 22:37 and loving GOD and neighbor means do no harm. - Romans 13:10 – previously stated question #2.</p> <p>My religious objections to CV-19 mRNA and adenovirus vector vaccines: COVID-19 vaccines are the first mRNA (Pfizer/Moderna) or adenoviral vector (J&J) vaccines. They do not operate the same as “traditional” vaccines. Instead of fragment dead virus and an adjuvant to induce immune response, they use genetic coding to instruct the body to produce a spike protein that is not natural to your own human genetic system, which has been proven to alter a human’s genetic structure as well as spread to the rest of the body.</p> <p>This goes against the way that GOD/Creator created our bodies in HIS own image by genetically altering the human body.</p>
8.	Please identify the specific religious tenet, practice or observance that prohibits receiving vaccines developed or tested using fetal cell lines.	<p>I am an evangelical Christian who believes the Bible as the Word of GOD – Matthew 22:37 and loving GOD and neighbor means do no harm. - Romans 13:10 – previously stated question #2</p> <p>Exodus 20:13 Thou shall not Kill. (My religious objection to these vaccines produced from aborted fetuses shows a profound disrespect for the remains of these children. Using vaccines that exploit these deaths for profit violates the GOD’s teachings for Life and respect thereof.</p>
9.	The Vatican, Evangelicals and numerous other Christian groups have endorsed the COVID-19 vaccines and	The Vatican does not speak for all Christians – The Bible does. We know abortion is murder. - Exodus 20:13 Thou shall not Kill.

	pronounced that the connection between the fetal cell lines used in vaccine testing and actual abortion is sufficiently remote and the pandemic sufficiently serious to allow members to receive the vaccine in good conscience. Are your beliefs contrary to this pronouncement? If so, why?	
10.	Have you taken vaccines for any of the following diseases: rubella (measles), varicella (chickenpox), or hepatitis A?	No.
11.	Have you authorized your children to receive vaccines for rubella (measles), varicella (chickenpox), or hepatitis A?	This is irrelevant to my Religious Exemption Accommodation request and breaches privacy boarders.
12.	If your answer to question #10 and/or #11 is "yes," why is your position with respect to the COVID-19 vaccine different than for these other vaccines, all of which are also grown in cell lines derived from fetuses?	
13.	Many common medications were also developed using the same type of technology used in the development of Covid-19 vaccines, including Tylenol, Pepto Bismol, aspirin, Tums, Lipitor, Senokot, Motrin, ibuprofen, Maalox, Ex-Lax, Benadryl, Sudafed, albuterol, Preparation H, Claritin, Zoloft, Prilosec OTC, and azithromycin. Do your beliefs prohibit you from taking and will you in the future abstain from taking these and other similar medications? If not, what tenet or belief prohibits the use of the Covid-19 vaccine, but permits the use of these other medications?	<p>I do not utilize many of the medicines mentioned but have always had the choice of whether to take them or not. They have never been forced on me or affected my livelihood.</p> <p>I see a clear difference between helping a body in crisis and addressing a healthy body with medical help or intervention. If my body were in crisis, I would consider all the options and discuss what to do with my trusted physician/healer, while praying for GOD's help, guidance and healing for longevity to my life.</p> <p>I will continue living my life by the obedience of GOD's Word and in faith of Jesus Christ to keep me and my family safe from harm.</p>



RELIGIOUS VACCINE EXEMPTION LETTER

August 24, 2021

To Whom It May Concern:

I SARINA KEENE (MSK) hold as:

My sincerely held religious beliefs as a spiritual being with a Christian worldview do not allow me to receive a COVID-19 vaccine.

My beliefs are an all-encompassing guide to my daily life choices and while I am not perfect, I strive to honor GOD in all I do. Matthew 22:37

The COVID-19 vaccines include the current COVID-19 mRNA vaccines and the Janssen vaccine which are produced with aborted fetal cell lines.

The Johnson & Johnson vaccine (Janssen), uses retinal cells from a fetus that was aborted in 1985 and treated in a lab; since the Pfizer and Moderna vaccines test the mRNAs on fetal cell lines from an aborted fetus cell from 1973.

Therefore, in my sincerely held belief as a spiritual being with a Christian worldview, I cannot use any product that takes its origin in abortion.

"For you created my inmost being; you knit me together in my mother's womb." Psalm 139:13. The inmost being is extremely sacred. I will not knowingly participate in the process to use such a product that violates the right to life and dishonors the lives of the unborn. God's word tells me to keep my body pure. I cannot receive a COVID-19 vaccine under any circumstance.

Furthermore, the V.A.E.R.S report provided by the CDC has shown significant harm injury, and death by the implementation of these experimental vaccines in just 6 months.

Total reactions for the experimental mRNA vaccine **Tozinameran** (code **BNT162b2, Comirnaty**) from **BioNTech/ Pfizer: 9,868 deaths** and **767,225 injuries** to 31/07/2021

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These serious and fatal injuries are increasing daily and confirm injury and harm. Even 40% of the employees of the CDC have not taken the vaccines having faced these claims as per Dr. Fauci's own words.

My Body is the "...Temple of the Living GOD..." 1 Corinthians 6:19-20 and I shall not knowingly do any harm to myself or others by participating in this experimental program.

I trust in the LORD. Ephesians 6:10-18 directs us to "Put on the armor of God," so that we can be equipped with truth, righteousness, peace, and faith. We are taught not to be afraid and that we have divine protection. In GOD and Jesus Christ, I Trust.

I can certainly testify to this because as you are aware, throughout the whole pandemic, I have been working according to your policies and measures required of the employees.

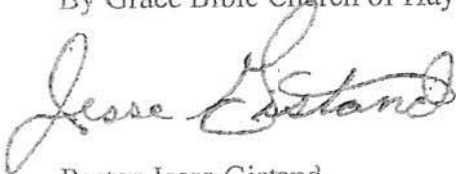
I wish to continue my gainful employment with this company as my family depends upon it and I am willing to make the necessary adjustments that will work towards that end without violating my conscience.

The law requires accommodations to be offered for religious exemptions. My sincerely held ethical, moral, and religious beliefs are universal, encompassing my belief and faith in Jesus Christ and I cannot violate my conscience, given to me by God.

I am available to answer additional questions if needed, provided they are a "reasonable inquiry," as allowed for by law.

Sincerely, 

This religious exemption letter is written and approved
By Grace Bible Church of Hayward CA



Pastor Jesse Gistand

EXHIBIT 3



City and County of San Francisco

DETERMINATION ON COVID-19 VACCINATION EXEMPTION REQUEST

Employee Name	Employee DSW#
Selina Keene (Ms. K)	21119
Job Code and Title	Department
9704 - Employment & Training Specialist III	HSA
Division/Unit	Supervisor/Manager
WDD	Kemeisha James / Bart Ellison

This notice is to advise you of the following departmental determination on your request for exemption from COVID-19 vaccination requirements submitted on 10 / 12 / 2021.

☐ **APPROVED**

Your request for an exemption based on a disability, medical condition, or sincerely held religious belief is **APPROVED**. You will remain in your current position with the following reasonable accommodations (including any mandatory health and safety protocols for unvaccinated employees, such as regular testing and specific masking requirements and to protect coworkers and members of the public):

(Attach separate sheet as necessary.) Failure to comply with any of the required accommodations, including health and safety requirements, may result in revocation of this approval.

DURATION

Approved accommodations are subject to change in accord with public health orders, or to align with current essential job functions, or operational needs. Should either your condition or religious beliefs change such that this accommodation is no longer necessary, or needs to be modified, you must immediately notify your supervisor or department Human Resources personnel.

This accommodation is subject to review and re-approval on: / / 20 .

☒ **DENIED**

☐ **DISABILITY OR MEDICAL CONDITION**

Your request for an exemption based on an asserted disability or medical condition is **DENIED** for the following reason(s):

- ☐ Medical Documentation Inadequate/Not Submitted
- ☐ No Disability or Medical Condition Requiring Accommodation
- ☐ Accommodation Would Pose a Direct Threat to the Health and Safety of Others and/or Yourself
- ☐ Accommodation Would Prevent Employee from Performing Essential Function(s)
- ☐ Accommodation Would Result in Undue Hardship for the City
- ☐ Other: _____

☒ **SINCERELY HELD RELIGIOUS BELIEF**

Your request for an exemption based on an asserted sincerely held religious belief, practice or observance is **DENIED** for the following reason(s):

- ☒ Documentation Insufficient to Show a Conflict Between Vaccination Requirement and Sincerely Held Religious Belief, Practice or Observance
- ☒ Accommodation Would Pose a Direct Threat to the Health and Safety of Others and/or Yourself
- ☐ Accommodation Would Prevent Employee from Performing Essential Function(s)
- ☒ Accommodation Would Result in Undue Hardship for the City
- ☐ Other: _____

☐ **CITYWIDE SEARCH**

The department has determined that you have a medical condition, disability, or sincerely held religious belief that precludes you from being vaccinated, but that the department cannot reasonably accommodate you in your current position. While you cannot remain in your current position, you may continue the interactive process to explore other options for reasonable accommodation through the Citywide job vacancy search. This 60-day process involves a search for available, vacant, non-promotive positions within City employment for which you are qualified and that you can perform while unvaccinated, with or without accommodation.

FOR HR USE ONLY

Vaccination Status Updated in PeopleSoft ☐ Yes ☐ No

Date Determination Form Uploaded to PeopleSoft: ____/____/20____

Referred to Citywide Reasonable Accommodation Coordinator ☐ Yes ☐ No

EXHIBIT 4

Lim, Brenden (HSA)

From: Melody Fountila <fountila@att.net>
Sent: Thursday, September 23, 2021 4:58 PM
To: Lim, Brenden (HSA); Katrina.williams@sfgov.org; jane.white@sfgov.org
Cc: Keene, Selina (HSA); Daniela Gonzalez; Morgan, Darryl (HSA)
Subject: Religious Exemption
Attachments: Grace Bible letter signed.pdf; Religious Exemption Paperwork signed .pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Mr. Lim,

I am submitting my Religious Exemption form and letter for processing. I have cc'd my Union Representatives on this email. I am providing written authorization to allow them to support me through this process. Thank you.

Your attention, assistance and support is appreciated.

Respectfully

Ms. Melody Fountila



City and County of San Francisco

**EMPLOYEE REQUEST FOR
RELIGIOUS ACCOMMODATION
(COVID-19 Vaccination Exemption)**

Employee Name	Employee DSW#
Melody M. Fountila	037563
Job Code and Title	Department
Employment & Training Specialist III	HSA
Division/Unit	Supervisor/Manager
WDD	Kameisha James / Bart Ellison

The City and County of San Francisco (City) is committed to equal employment opportunities for all employees and a work environment that is free of unlawful harassment, discrimination, and retaliation. Consistent with this commitment, the City complies with all laws protecting employees' religious beliefs, practices and observances. When requested, the City will provide an exemption or reasonable accommodation for employees' sincere religious beliefs, practices and observances, which prohibit the employee from receiving a COVID-19 vaccination, provided the requested accommodation is reasonable and does not create an undue hardship for the City or pose a direct threat to the health and/or safety of the employee or others in the workplace.

San Francisco Department of Public Health Order No. C19-07, requires persons routinely working onsite in High-Risk Settings as defined in the Order to receive a COVID-19 vaccination and report their vaccination status to their employer effective September 15, 2021. City policy must comply with this public health order, and will also require all other City employees to receive a vaccination within 10 weeks of FDA approval of any COVID-19 vaccine. A religious exemption may be granted to City employees who: (1) hold a sincere religious belief that conflicts with the vaccination requirement, (2) complete this request form, and (3) provide any information needed to support the exemption request.

EMPLOYEE CERTIFICATION

I request an exemption from the local Public Health Order and City Policy requiring COVID-19 vaccinations for all City employees. I make this request based on my sincere religious belief(s), practice(s), or observance(s). My beliefs are in conflict with the vaccination requirement, and I certify the following is true:

1. My religion or belief system is (enter name or description): Christian
2. I have held this belief(s) system, or practiced and observed this religion since (enter date or year): 1990
3. My religion, belief system, or practice requires me to abstain from the COVID-19 vaccination because (describe the specific tenet, practice, or observation that conflicts with the COVID-19 vaccination requirement and/or explain how you follow it):

My sincere held religious beliefs as a spiritual being with a Christian worldview do not allow me to receive a COVID-19 vaccine. My beliefs are an all-encompassing guide to my life choices and while I am not perfect, I strive to honor GOD in all I do. Matthew 22:37 The COVID-19 vaccine The Johnson & Johnson vaccine (Janssen), uses retinal cells from a fetus that was aborted in 1985 and treated in a lab; since the Pfizer and Moderna vaccines test the mRNAs on fetal cell lines from an aborted fetus cell from 1973. Therefore, in my sincerely held belief as a spiritual being

Continued on Page 2

4. If your religion, belief system, or practice requires you to abstain from the COVID-19 vaccination, but not other
- (Rev. 7/30/2021)

EMPLOYEE REQUEST FOR RELIGIOUS ACCOMMODATION
(COVID-19 Vaccination Exemption), Page 2 of 2

types of vaccinations, please describe the specific tenet, practice, or observation that expressly conflicts with the COVID-19 vaccination (*attach a separate sheet if needed*).

See attachment

5. If requested, I can provide a written statement, an affidavit or other documents from a religious leader, or other person describing my beliefs and practices, including information regarding when I embraced the belief or practice, as well as when, where, and how I have adhered to the belief, practice, observance. ☒ YES ☐ NO

I hereby certify that I make this request based on my sincerely held religious beliefs that prevent me from complying with COVID-19 vaccination requirements. I understand that any falsified information can lead to disciplinary action, up to and including termination of employment.

I also understand that my request for an accommodation may not be approved if it is not reasonable, if it poses a direct threat to the health and/or safety of others in the workplace and/or me, or if it creates an undue hardship for the City.


Employee Signature

August 31, 2021

Date

Please note that this information will be maintained in a separate confidential file from your personnel file and access will be limited only to those with a need-to-know.

FOR HR USE ONLY

Date Received: ___/___/20___ Medical Certification Received ☐ Yes ☐ No

Date Medical Certification Received: ___/___/20___



RELIGIOUS VACCINE EXEMPTION LETTER

August 24, 2021

To Whom It May Concern:

I Melody Fountib hold as:

My sincerely held religious beliefs as a spiritual being with a Christian worldview do not allow me to receive a COVID-19 vaccine.

My beliefs are an all-encompassing guide to my daily life choices and while I am not perfect, I strive to honor GOD in all I do. Matthew 22:37

The COVID-19 vaccines include the current COVID-19 mRNA vaccines and the Janssen vaccine which are produced with aborted fetal cell lines.

The Johnson & Johnson vaccine (Janssen), uses retinal cells from a fetus that was aborted in 1985 and treated in a lab; since the Pfizer and Moderna vaccines test the mRNAs on fetal cell lines from an aborted fetus cell from 1973.

Therefore, in my sincerely held belief as a spiritual being with a Christian worldview, I cannot use any product that takes its origin in abortion.

"For you created my inmost being; you knit me together in my mother's womb." Psalm 139:13. The inmost being is extremely sacred. I will not knowingly participate in the process to use such a product that violates the right to life and dishonors the lives of the unborn. God's word tells me to keep my body pure. I cannot receive a COVID-19 vaccine under any circumstance.

Furthermore, the V.A.E.R.S report provided by the CDC has shown significant harm injury, and death by the implementation of these experimental vaccines in just 6 months.

Total reactions for the experimental mRNA vaccine **Tozinameran** (code **BNT162b2, Comirnaty**) from **BioNTech/ Pfizer**: **9,868 deaths** and **767,225 injuries** to 31/07/2021

Total reactions for the experimental mRNA vaccine **mRNA-1273(CX-024414)** from **Moderna**: **5,460 deaths** and **212,474 injuries** to 31/07/2021

admin office: 22768 Main St., Hayward, CA 94541 • church building: 20560 Royal Ave., Hayward, CA 94541
phone: 510.886.9782 • email: gbc@grace-bible.com • website: www.grace-bible.com

These serious and fatal injuries are increasing daily and confirm injury and harm. Even 40% of the employees of the CDC have not taken the vaccines having faced these claims as per Dr. Fauci's own words.

My Body is the "...Temple of the Living GOD..." 1 Corinthians 6:19-20 and I shall not knowingly do any harm to myself or others by participating in this experimental program.

I trust in the LORD. Ephesians 6:10-18 directs us to "Put on the armor of God," so that we can be equipped with truth, righteousness, peace, and faith. We are taught not to be afraid and that we have divine protection. In GOD and Jesus Christ, I Trust.

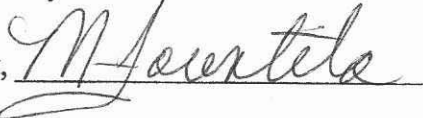
I can certainly testify to this because as you are aware, throughout the whole pandemic, I have been working according to your policies and measures required of the employees.

I wish to continue my gainful employment with this company as my family depends upon it and I am willing to make the necessary adjustments that will work towards that end without violating my conscience.

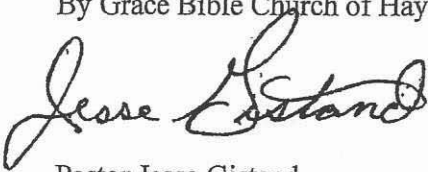
The law requires accommodations to be offered for religious exemptions. My sincerely held ethical, moral, and religious beliefs are universal, encompassing my belief and faith in Jesus Christ and I cannot violate my conscience, given to me by God.

I am available to answer additional questions if needed, provided they are a "reasonable inquiry," as allowed for by law.

Sincerely,



This religious exemption letter is written and approved
By Grace Bible Church of Hayward CA



Pastor Jesse Gistand

EXHIBIT 5

Lim, Brenden (HSA)

From: fountila <fountila@att.net>
Sent: Tuesday, October 12, 2021 9:12 AM
To: Tang, Lily (HSA); Lim, Brenden (HSA)
Cc: Keene, Selina (HSA); daniela.gonzalez@seiu1021.org; Morgan, Darryl (HSA)
Subject: RE: Religious Exemption

Good morning Lily,

I have already replied to this question. However, I've not been vaccinated in over 30 years and that has been by choice. My body belongs to God and is the temple of God and I choose not to defile it. "What? know ye not that your body is the temple of the Holy Ghost which is in you, ye have of God, and ye are not your own? For ye are bought with a price: therefore glorify God in your body, and in your spirit, which are God's.

1 Corinthians 6:19-20 KJV

<https://bible.com/bible/1/1co.6.19-20.KJV>"

I have never take the flu shot and today I choose not to take any medications because they have adversely affected my body and caused harm. As far as my children, as stated before their privacy is their privacy and this question breaches their privacy. Their information has nothing to do with my religious exemption.

Respectfully

Melody Fountila

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: "Tang, Lily (HSA)" <lily.tang@sfgov.org>

Date: 10/8/21 9:00 AM (GMT-08:00)

To: Melody Fountila <fountila@att.net>, "Lim, Brenden (HSA)" <brenden.lim@sfgov.org>

Cc: "Keene, Selina (HSA)" <selina.keene@sfgov.org>, daniela.gonzalez@seiu1021.org, "Morgan, Darryl (HSA)" <darryl.morgan@sfgov.org>

Subject: RE: Religious Exemption

Good Morning Melody,

Thank you for responding to some our questions. As we are in the process of evaluating your exemption request, answers to our questions are critical in the evaluation process. Please be advised that your continued participation and answers to our questions, will be helpful in understanding individual sincere held beliefs.

It appears from your responses that you and/or your children may have been previously vaccinated with other vaccines for school purposes, and that you and your family may have previously taken some medication that was developed similarly to the development of the Covid-19 vaccine. Please confirm if our interpretation of your responses is correct.

Please be advised that after receiving your response, we will be evaluating your additional responses and documentation to make a determination in the next week or so.

Thanks,

Lily

From: Melody Fountila <fountila@att.net>
Sent: Wednesday, October 6, 2021 1:57 AM
To: Lim, Brenden (HSA) <brenden.lim@sfgov.org>; Tang, Lily (HSA) <lily.tang@sfgov.org>
Cc: Keene, Selina (HSA) <selina.keene@sfgov.org>; daniela.gonzalez@seiu1021.org; Morgan, Darryl (HSA) <darryl.morgan@sfgov.org>
Subject: Re: Religious Exemption

Good Morning Lily,

I have attached my response to your questions, all 15. I would also like to know when or how long does this process take to make a determination? Thank you and look forward to hearing from you soon.

On Tuesday, October 5, 2021, 10:38:11 AM PDT, Tang, Lily (HSA) <lily.tang@sfgov.org> wrote:

Hi Melody,

Thank you for the update. Please respond to the questions as you can possible so we can evaluate your vaccine exemption request.

Best,

Lily

From: fountila <fountila@att.net>
Sent: Tuesday, October 5, 2021 10:22 AM
To: Tang, Lily (HSA) <lily.tang@sfgov.org>; Lim, Brenden (HSA) <brenden.lim@sfgov.org>
Cc: Keene, Selina (HSA) <selina.keene@sfgov.org>; daniela.gonzalez@seiu1021.org; Morgan, Darryl (HSA) <darryl.morgan@sfgov.org>
Subject: RE: Religious Exemption

Hello Lily,

I just wanted to let you know that I've forward your questions to the union because I'm unsure if they are appropriate. As soon as I hear back I will respond to your questions. Thank you.

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: "Tang, Lily (HSA)" <lily.tang@sfgov.org>

Date: 9/30/21 6:43 PM (GMT-08:00)

To: fountila <fountila@att.net>, "Lim, Brenden (HSA)" <brenden.lim@sfgov.org>

Cc: "Keene, Selina (HSA)" <selina.keene@sfgov.org>, daniela.gonzalez@seiu1021.org, "Morgan, Darryl (HSA)" <darryl.morgan@sfgov.org>

Subject: RE: Religious Exemption

Hi Melody,

Please respond to the following questions.

No.	Question	Response
1	Have you taken vaccines for any of the following diseases: rubella (measles), varicella (chickenpox), or hepatitis A?	

2	Have you authorized your children to receive vaccines for rubella (measles), varicella (chickenpox), or hepatitis A?	
3	If your answer to question #1 and/or #2 is “yes,” why is your position with respect to the COVID-19 vaccine different than for these other vaccines, all of which are also grown in cell lines derived from fetuses?	
4	The Vatican, Evangelicals and many Christian denominations have endorsed the COVID-19 vaccine and pronounced that the connection between the fetal cell lines used in vaccine testing and actual abortion is sufficiently remote and the pandemic sufficiently serious to allow members to receive the vaccine in good conscience. Are your beliefs contrary to this pronouncement? If so, why?	
5	Many common medications were also developed using the same type of technology used in the development of Covid-19 vaccines, including Tylenol, Pepto Bismol, aspirin, Tums, Lipitor, Senokot, Motrin, ibuprofen, Maalox, Ex-Lax, Benadryl, Sudafed, albuterol, Preparation H, Claritin, Zoloft, Prilosec OTC, and azithromycin. Do your beliefs prohibit you from taking and will you in the future abstain from taking these and other similar medications? If not, what tenet or belief prohibits the use of the Covid-19 vaccine, but permits the use of these other medications?	

Thanks,

Lily

From: fountila <fountila@att.net>

Sent: Monday, September 27, 2021 5:36 PM

To: Tang, Lily (HSA) <lily.tang@sfgov.org>; Lim, Brenden (HSA) <brenden.lim@sfgov.org>

Cc: Keene, Selina (HSA) <selina.keene@sfgov.org>; daniela.gonzalez@seiu1021.org; Morgan, Darryl (HSA)

<darryl.morgan@sfgov.org>

Subject: RE: Religious Exemption

Excuse me Lily I have included the union representatives that should remain for future correspondence. Thank you

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: fountila <fountila@att.net>

Date: 9/27/21 5:27 PM (GMT-08:00)

To: "Tang, Lily (HSA)" <lily.tang@sfgov.org>, brenden.lim@sfgov.org

Subject: RE: Religious Exemption

Hello Ms. Lily,

Please maintain my union reps on all future communications regarding my religious exemption. As stated in my initial email they have my authorization to be involved during this whole religious exemption process. So please don't fail to leave them out in any future correspondence.

Your attention, cooperation, and assistance is appreciated.

Sincerely,

Melody M. Fountila

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: "Tang, Lily (HSA)" <lily.tang@sfgov.org>

Date: 9/27/21 1:16 PM (GMT-08:00)

To: fountila <fountila@att.net>

Subject: RE: Religious Exemption

Hi Melody,

We have received your documentation. Please find a link to the FDA's approval of the Covid-19 vaccine: <https://www.fda.gov/news-events/press-announcements/fda-approves-first-covid-19-vaccine>.

Since you have been out on leave, please also refer to the town hall webinar on vaccine concern on September 13, 2021 by Dr. Ayanna Bennett and Dr. Joseph Graterol which can be viewed at <https://intranet.sfhhsa.org/whats-new-at-hsa/hsa-all-staff-presentation-covid-19-vaccination-concerns>.

Please respond to the questions below:

No.	Question	Response
1.	Please identify the specific religious tenet that prohibits the COVID-19 vaccination	
2.		

	Please identify the Christian Sect or denomination that teaches that the COVID-19 vaccination is prohibited	
3.	Can you provide any existing literature to support your exemption request?	
4.	State whether the views expressed in your religious exemption request are part of a shared or comprehensive doctrine and how long the doctrine has existed.	
5.	Do you regularly worship with others sharing your beliefs about the COVID-19 vaccine, if so, how often and where are services generally held?	
6.	Do you have a declaration supporting your religious exemption request from your pastor or religious leader?	
7.	The Vatican, Evangelicals and numerous other Christian groups have endorsed the COVID-19 vaccines and pronounced that the connection between the fetal cell lines used in vaccine testing and actual abortion is sufficiently remote and the pandemic sufficiently serious to allow members to receive the vaccine in good conscience. Are your beliefs contrary to this pronouncement? If so, why?	
8.	Please identify the specific religious tenet, practice or observation used to	

	identify substances that are harmful, and state how you applied this to the COVID-19 vaccine.	
10.	Please identify the specific religious tenet, practice or observance that prohibits receiving vaccines developed or tested using fetal cell lines.	

Thank You

Lily Tang (she, her, hers)

Analyst

Human Resources: Office of Civil Rights

O: (415) 557-5810

C: (415) 624-5042

Mailing Address:

1650 Mission Street, Suite 400
San Francisco, California 94103

www.SFHSA.org

-

-

From: Lim, Brenden (HSA) <brenden.lim@sfgov.org>
Sent: Friday, September 24, 2021 10:41 AM
To: Tang, Lily (HSA) <lily.tang@sfgov.org>
Subject: FW: Religious Exemption

-

-

-

Sent with BlackBerry Work (www.blackberry.com)

From: Melody Fountila <fountila@att.net>
Sent: Sep 23, 2021 4:58 PM
To: "Lim, Brenden (HSA)" <brenden.lim@sfgov.org>; "Katrina.williams@sfgov.org" <katrina.williams@sfgov.org>; jane.white@sfgov.org
Cc: "Keene, Selina (HSA)" <selina.keene@sfgov.org>; Daniela Gonzalez <daniela.gonzalez@seiu1021.org>; "Morgan, Darryl (HSA)" <darryl.morgan@sfgov.org>
Subject: Religious Exemption

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Mr. Lim,

I am submitting my Religious Exemption form and letter for processing. I have cc'd my Union Representatives on this email. I am providing written authorization to allow them to support me through this process. Thank you.

Your attention, assistance and support is appreciated.

Respectfully

Ms. Melody Fountila

CCSF-HSA - All outbound HSA email is automatically scanned for PII and PHI by Zix Email Encryption

1. Please identify the specific religious tenet that prohibits the COVID-19 vaccination	As stated in my exemption- My body is the temple of GOD- it is not to be subjected to coercive experiments with clear danger and harm already proven by the CDC/VAERS	
2.	Please identify the Christian Sect or denomination that teaches that the COVID-19 vaccination is prohibited	<p>I am a evangelical Christian that believes the Bible as the Word of GOD- Mt 22:37 Jesus said unto him, Thou shalt love the Lord thy God with all thy heart, and with all thy soul, and with all the mind. And loving GOD and neighbor means do no harm.</p> <p>Rom 13:10 Love worketh no ill to his neighbor: therefore love is the fulfilling of the law.</p>
3.	Can you provide any existing literature to support your exemption request?	The Bible – The Word of GOD-Title 7 of the federal code-
4.	State whether the views expressed in your religious exemption request are part of a shared or comprehensive doctrine and how long the doctrine has existed.	The Church of Jesus Christ has been in existence since Ad 33 and has engaged the world to love God and do no harm as stated above.
5.	Do you regularly worship with others sharing your beliefs about the COVID-19 vaccine, if so, how often and where are services generally held?	This line of questioning is also irrelevant to the matters at hand and appears to only serve some data gathering agenda.
6.	Do you have a declaration supporting your religious exemption request from your pastor or religious leader?	Already submitted!

7.	The Vatican, Evangelicals and numerous other Christian groups have endorsed the COVID-19 vaccines and pronounced that the connection between the fetal cell lines used in vaccine testing and actual abortion is sufficiently remote and the pandemic sufficiently serious to allow members to receive the vaccine in good conscience. Are your beliefs contrary to this pronouncement? If so, why?	The Vatican does not speak for all Christians – The bible does- And we know that abortion is murder- Per the bible in Exodus 20:13, 15 Thou shall not KILL. And theft of life.
8.	Please identify the specific religious tenet, practice or observation used to identify substances that are harmful, and state how you applied this to the COVID-19 vaccine.	I am an evangelical Christian that believes the Bible as the Word of GOD- Mt 22:37 and loving GOD and neighbor means do no harm Rom 13:10
10.	Please identify the specific religious tenet, practice or observance that prohibits receiving vaccines developed or tested using fetal cell lines.	I am an evangelical Christian that believes the Bible as the Word of GOD- Mt 22:37 and loving GOD and neighbor means do no harm Rom 13:10

1.

Have you taken vaccines for any of the following diseases: rubella (measles), varicella (chickenpox), or hepatitis A?

First, let me state, Perhaps- as child or an adult in my ignorance, before I became more informed about vaccines and now I'm I am more informed and know better.

2.

Have you authorized your children to receive vaccines for rubella (measles), varicella (chickenpox), or hepatitis A?

This is irrelevant to my request and breaches privacy.

3. If your answer to question #1 and/or #2 is “yes,” why is your position with respect to the COVID-19 vaccine different than for these other vaccines, all of which are also grown in cell lines derived from fetuses?

My first answer would suffice for questions 2,3-

4.

The Vatican, Evangelicals and many Christian denominations have endorsed the COVID-19 vaccine and pronounced that the connection between the fetal cell lines used in vaccine testing and actual abortion is sufficiently remote and the pandemic sufficiently serious to allow members to receive the vaccine in good conscience. Are your beliefs contrary to this pronouncement? If so, why?

The Vatican does not speak for all Christians – The bible does- And we know that abortion is murder- Per Exodus 20:13, 15-And theft of life.

5.

Many common medications were also developed using the same type of technology used in the development of Covid-19 vaccines, including Tylenol, Pepto Bismol, aspirin, Tums, Lipitor, Senokot, Motrin, ibuprofen, Maalox, Ex-Lax, Benadryl, Sudafed, albuterol, Preparation H, Claritin, Zoloft, Prilosec OTC, and azithromycin. Do your beliefs prohibit you from taking and will you in the future abstain from taking these and other similar medications? If not, what tenet or belief prohibits the use of the Covid-19 vaccine, but permits the use of these other medications?

Let me say, I have been making healthier choices for myself to better my health and longevity to my life. If what you are saying is true then society, as a whole should know this to make wiser choices. The difference is that these products are not being forced upon us at threat of our livelihoods. This vaccine mandate is an act of unconstitutional coercion. And violation of my privacy and basic human rights.



Outline – Thursday, September 16, 2021

All Things COVID #1
The Peter McCullough PRESENTATION
With Post Commentary
by Pastor Jesse Gistand

Proverbs 14:15 - The people of GOD MUST be prudent, discerning and wise about their choices, understanding and walk with GOD. May He show us wisdom and humility as we seek Him.

THE Below FACTS have PROVEN to be TRUE in spite of MEDIA suppression of DATA and punishing good men and women who are blowing the Trumpet.

1. The virus does not spread asymptotomatically
2. We should never test asymptomatic people
3. Natural immunity is robust, complete, and durable
4. COVID-19 is easily treatable at home
5. The current vaccines are obsolete, unsafe, and unfit for human use
6. V. A. E. R. S - has made known the REAL HARM - time - 1:15:55 - 45,000 deaths
7. Macklin Analysis - “Evidence Based Group” says stop it - to WHO - 40:22
8. “I took the vaccines I’m Fine therefore - You should take it”- is false
9. The CDC MMWR July 30 report - 43:20
10. You are a group of FAITH your leaders will help you through it - 1:12:55
11. FORCED vaccines taking place around the world - 1:11-1:12:44
12. The CDC say’s ILLEGAL to IMPOSE a MANDATE- investigative Vax - 1:15:37
The Spike Protein is TOXIC and is the culprit
13. This is a PROGRAM of FEAR - to get a needle at all COST - 1:13-14
14. THE CENSORSHIP – STATED - NEWS - INITIATIVE
15. Psychology - Mass Psychosis - 1:15 - 1:16
16. The Most common person in the U.S.A who refuses the Vaccines- has a PHD - Vaccine
Secrets/COVID Crisis #11 - Erin Elizabeth journalist - 12:50 - 13:30

17. Wearing masks not only not works to stop COVID but is weakening your immune system by gradual and continued lack of oxygen - “A Next Thursday event”
18. Graphene-Oxide-toxic metal very harmful for the cellular system in many of the vaccines nano lipid

VACCINES INJURIES and DEATH

EudraVigilance database

23,252 Deaths 2,189,537 Injuries Following COVID Shots Reported in European Union’s Database of Adverse Drug Reactions – August 28, 2021

- COVID-19 MRNA VACCINE MODERNA (CX-024414)
- COVID-19 MRNA VACCINE PFIZER-BIONTECH
- COVID-19 VACCINE ASTRAZENECA (CHADOX1 NCOV-19)
- COVID-19 VACCINE JANSSEN (AD26.COV2.S)

Total reactions for the mRNA vaccine Tozinameran (code BNT162b2,Comirnaty) from BioNTech/ Pfizer: 11,266 deaths and 900,032 injuries to 28/08/2021

Total reactions for the mRNA vaccine mRNA-1273(CX-024414) from Moderna: 6,029 deaths and 254,648 injuries to 28/08/2021

Total reactions for the vaccine AZD1222/VAXZEVRIA (CHADOX1 NCOV-19) from Oxford/ AstraZeneca: 4,991 deaths and 965,095 injuries to 28/08/2021

Total reactions for the COVID-19 vaccine JANSSEN (AD26.COV2.S) from Johnson & Johnson: 966 deaths and 69 762 injuries to 28/08/2021

Teens 50X More Likely to Have Heart Disease After COVID Shots than All Other FDA Approved Vaccines in 2021 Combined – CDC Admits True but Still Recommends It

<https://healthimpactnews.com/2021/23252-deaths-2189537-injured-following-covid-shots-reported-in-european-unions-database-of-adverse-drug-reactions/>

A CDC Whistle Blower is presently under gag order about 45,000 dead in a few days- in a lawsuit presently underway in the USA.



Thursday Night – Outline

September 23, 2021

Pastor Jesse Gistand

All Things COVID #2

Topics: Project Veritas and Mask Wearing

With Post Commentary by Pastor Jesse Gistand

A Biblical Deconstruction of VERITAS Exposed

1. This EVIL is NOT an anomaly. It happened a lot during the VIRUS outbreak – Prov. 1:10-16
2. The IMPULSE rooted in FEAR is to STRUGGLE with what is obviously EVIL – Rev. 21:8
3. The INTERNAL CONFLICT led the NURSE to clear mental DISRUPTION – Prov. 5:7-14
4. The OTHERS were COMPLIANT “I don’t want to LOSE my JOB” – Rom. 8:5-7
5. Reprobate Rationalization “We are documenting but not reporting it” – Rom. 1:19
6. The Only way this STOPS is OPPOSITION/EXPOSURE to it! – Eph. 5:9-13
7. The Head CHRISTIAN Nurse is a HERO – James 4:7
8. She will be REWARDED for her Pain – Rom. 8:13b/Rev. 11:18

“This is all a part of operation LOCKSTEP” – TOP DOWN Management of a CRISIS staying with the script – no matter how immoral or evil it is. This is CONSCIOUSLESS Compliance – Australia – France – Canada – Israel – countries excelling in this practice.

NEWS

47 studies confirm ineffectiveness of masks for COVID and 32 more confirm their negative health effects.

Young children being forced to wear masks is of particular concern.

<https://www.lifesitenews.com/news/47-studies-confirm-ineffectiveness-of-masks-for-covid-and-32-more-confirm-their-negative-health-effects/>



Please REGARD the overuse of wearing masks. Past pandemics have proven deadly for those instructed to wear masks. The Short video will give 7 reasons why we are being manipulated. PJ

<https://mamm.org/a-crash-course-on-face-masks/>

1. Do Mask Work and are they the best protection against COVID? – True or False
2. Viruses easily pass through the common Mask – True or False
3. The Box instruction tells you the mask do not protect against viruses – True or False
4. Is the mask for Show to keep the masses from going into panic? – True or False
5. Are mask wearers taking in carbon dioxide and dramatically reducing oxygen intake compromising their immune system? – True or false
6. Are masks causing serious gum disease and graphene in the blue mask can cause cancer? – True or False
7. Face masks do not Work and are not required by law and should not be worn except in emergency situation. – True or false

Let the teenagers in this video school us on logic.



Wednesday Night – Outline

September 29, 2021

Pastor Jesse Gistand

All Things COVID #3

**Topics: THE FACTS and FALSEHOOD
of the COVID/VACCINE Delusion**

“A Doctor and a Nurse Video Expose”

With Post Commentary by PJ

“I QUIT – I’m DONE”

1. **Albert Spence** a nurse for 31 yrs. Traveling COVID Nurse Jan. 20th April 1st – I ain’t going back Jan. 20, 2021 – “I UNKNOWINGLY KILLED PATIENTS /COVID PROTOCOL”
2. Get your patients UP out of the Chair, INFLAMMATION is the ENEMY.
3. They have to be MOBILIZED – The Horse that lays down – Stays Down
4. I was the biggest COVID believer there ever was...
5. HE WORKED on the COVID Units – He loved His patients
6. The DANGER of REMDESIVIR antiviral – “FLASH PULMONARY EDEMA” – increasing your inflammation
7. Give them PLAZA – Lexington HOSPITAL – They’ve quit doing that – Dead in 2 DAYS
8. Saturation down to 70% – bacteria over – lungs SHOT – Why? THROMBOSIS
9. He found out that the CDC GUIDELINES – roll the patients into a waiting room to? _____
10. What did they want? _____
11. It HIT ME we Euthanized... They are crying, They are teared Up – Jan 20- Feb 1st
12. PCR cycling CHANGED – 67% Jan 15- Feb 15th drop in COVID cases --- Just flu!

FAUCI – a PCR after 35 – is FALSE

IF I GET SICK – I AM NOT GOING TO THE HOSPITAL...

Hospital Acquired Pneumonia – Especially during COVID – SENATE MEDICAL AFFAIRS

COMMITTEE <https://healthimpactnews.com/2021/pulmonary-nurse-of-31-years-testifies-how-he-unknowingly-killed-patients-following-covid-protocols/>

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“I DO NOT CONSENT”

Time start 1:13 – 1:55

DR. SIMONE GOLD –

Speaking at CALVARY CHAPEL SAN JOSE

1. **We had a medical issue which is become a LEGAL challenge** – March 2020
This not about HEALTH but Control of your life
2. **We are living Under Tyranny and most people do not realize it**
3. **The Real fact of CONSTITUTIONAL loss – Freedom of Religion, free speech is gone**
 - a. “We don’t need a free speech for only noncontroversial speech” early treatment
 - b. The Press is viscously corrupt – and a MONOPOLY
 - c. No freedom to assemble – 6 ft – mask distance – It worked
 - d. Can’t petition the government – not hearing cases...
 - e. The loss of BODILY integrity – Voluntarily Propaganda/Coercion/Vac/Mandate
 - f. Jury trials gone – Held without bail – no speedy TRIAL
4. **MEDICAL TYRANNY** – is the COMMUNIST tactic and is MOST EFFECTIVE –
1:15 min
5. **THE LIES – The VIRUS kills indiscriminately is false**
 - a. Personal individual susceptibility
 - b. Asymptomatic *do not spread* – test in China – 10 million people – 1:19 – NO sickness
 - c. Age of Death form COVID barely exceeds average life span – No threat
 - d. Early treatment is dangerous – INDIA – is still without any real problems
 - e. LOCK DOWNS do not WORK – 1:23
6. **THINGS ARE TURNING**
 - a. The VARIANTS – DELTA renders all the vaccines USELESS
 - b. 16 – 2 FDA against the BOOSTERS But the PRESIDENT still pushing it
 - c. The SHOT are not for WOMEN period but especially pregnant women
 - d. The VACCINATORS are actually the super spreaders – cases rise with vaccines
They carry 251x the viral load – means they are more prone to the virus. Proven

- e. Nature Journal August 12th, 2021 – Israel is an example – 1:30
 - f. If you had COVID you are immune and will be immune indefinitely
 - g. EARLY TREATMENT will always WORK no matter what the VARIANT
 - h. The VACCINES is not TESTED for effectiveness to STOP transmission
7. **THE REAL WAR is the VACCINES PASSPORT** – 1:39:4
- a. It's the real control factor coming and present – from China
 - b. Digital currency controls your income, and the passport will destroy your freedom
 - c. SIMONE'S TESTIMONY is chilling – PLEASE LISTEN to her experience
<https://rumble.com/vmpxrm-vac-family-night-dr.-simone-gold.html>

EXHIBIT 6



City and County of San Francisco

**DETERMINATION ON COVID-19
VACCINATION EXEMPTION REQUEST**

Employee Name	Employee DSW#
Melody Fountila	037563
Job Code and Title	Department
9704 - Employment & Training Specialist III	HSA
Division/Unit	Supervisor/Manager
WDD	Kameisha James / Bart Ellison

This notice is to advise you of the following departmental determination on your request for exemption from COVID-19 vaccination requirements submitted on 09 / 23 / 2021.

☐ **APPROVED**

Your request for an exemption based on a disability, medical condition, or sincerely held religious belief is **APPROVED**. You will remain in your current position with the following reasonable accommodations (including any mandatory health and safety protocols for unvaccinated employees, such as regular testing and specific masking requirements and to protect coworkers and members of the public):

(Attach separate sheet as necessary.) Failure to comply with any of the required accommodations, including health and safety requirements, may result in revocation of this approval.

DURATION

Approved accommodations are subject to change in accord with public health orders, or to align with current essential job functions, or operational needs. Should either your condition or religious beliefs change such that this accommodation is no longer necessary, or needs to be modified, you must immediately notify your supervisor or department Human Resources personnel.

This accommodation is subject to review and re-approval on: ____/____/20____.

☒ **DENIED**☐ **DISABILITY OR MEDICAL CONDITION**

Your request for an exemption based on an asserted disability or medical condition is **DENIED** for the following reason(s):

- ☐ Medical Documentation Inadequate/Not Submitted
- ☐ No Disability or Medical Condition Requiring Accommodation
- ☐ Accommodation Would Pose a Direct Threat to the Health and Safety of Others and/or Yourself
- ☐ Accommodation Would Prevent Employee from Performing Essential Function(s)
- ☐ Accommodation Would Result in Undue Hardship for the City
- ☐ Other: _____

☒ **SINCERELY HELD RELIGIOUS BELIEF**

Your request for an exemption based on an asserted sincerely held religious belief, practice or observance is **DENIED** for the following reason(s):

- ☒ Documentation Insufficient to Show a Conflict Between Vaccination Requirement and Sincerely Held Religious Belief, Practice or Observance
- ☒ Accommodation Would Pose a Direct Threat to the Health and Safety of Others and/or Yourself
- ☐ Accommodation Would Prevent Employee from Performing Essential Function(s)
- ☒ Accommodation Would Result in Undue Hardship for the City
- ☐ Other: _____

☐ **CITYWIDE SEARCH**

The department has determined that you have a medical condition, disability, or sincerely held religious belief that precludes you from being vaccinated, but that the department cannot reasonably accommodate you in your current position. While you cannot remain in your current position, you may continue the interactive process to explore other options for reasonable accommodation through the Citywide job vacancy search. This 60-day process involves a search for available, vacant, non-promotive positions within City employment for which you are qualified and that you can perform while unvaccinated, with or without accommodation.

FOR HR USE ONLY

Vaccination Status Updated in PeopleSoft ☐ Yes ☐ No

Date Determination Form Uploaded to PeopleSoft: ____/____/20____

Referred to Citywide Reasonable Accommodation Coordinator ☐ Yes ☐ No